

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DEBORAH BARONE,

Plaintiff,

v.

ETHICON INC. and JOHNSON &
JOHNSON,

Defendants.

Civil Action No. 4:20-cv-03950

PLAINTIFF'S UNOPPOSED MOTION TO CONTINUE HEARING

COMES NOW, Plaintiff Deborah Barone, ("Plaintiff") by and through the undersigned counsel, hereby respectfully submits this Unopposed Motion to Continue Hearing, and states as follows:

1. A Daubert Motion hearing in this matter is currently set for March 22nd, 2022.
2. The parties have conferred and agreed that it would be beneficial to seek a continuance of such hearing due to scheduling conflicts.
3. Plaintiff's counsel is currently set to start a two-week trial on March 22nd, 2022 and Defendants' counsel is unavailable on April 4th - 6th and on April 11th, 2022.
4. The parties have reached mutually agreeable proposed dates for April 7th, 12th, 13th or 14th, 2022.

WHEREFORE, Plaintiff, Deborah Barone, respectfully requests this Honorable Court enter an Order GRANTING Plaintiff's Unopposed Motion to Continue Hearing and continues the hearing

to a mutually convenient date.

Date: March 17th, 2021.

Respectfully submitted,

/s/ Alex Barlow

Alex Barlow
Shrader & Associates, L.L.P.
9 Greenway Plaza
Suite 2300
Houston, TX 77046
BAR #24006798 and S.D. Tex. #1402496
P: 713-782-0000
F: 713-571-9605
Email: barlow@shraderlaw.com

Attorney for Plaintiff

CERTIFICATE OF CONFERENCE

On March 17th, 2022, Plaintiff's counsel sent a copy of Plaintiff's Unopposed Motion to Continue Hearing to Defense counsel asking if he would agree to said motion. On March 17th, 2022, Defense Counsel informed that he is in agreement.

/s/ Alex Barlow

Alex Barlow

CERTIFICATE OF SERVICE

I hereby certify that on March 17th, 2022, a true and correct copy of the foregoing was served on counsel of record via the Court's CM/ECF system:

/s/ Alex Barlow

Alex Barlow